

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Carleen Maynor	:	Case No.: 5:19-bk-01701-MJC
aka Carleen Greenidge	:	Chapter: 13
aka Carleen Greenidge-Maynor	:	
Debtor	:	
	:	
SN Servicing Corporation as	:	
servicer for U.S. Bank Trust	:	
National Association, as Trustee of	:	
the Bungalow Series F Trust	:	
Movant	:	
Carleen Maynor	:	
aka Carleen Greenidge	:	
aka Carleen Greenidge-Maynor	:	
	:	
Jack N Zaharopoulos, Trustee	:	
Respondents	:	

ANSWER TO MOTION FOR RELIEF

AND NOW comes Debtor, Carleen Maynor, by and through her counsel, Newman Williams, P.C., and answers the Motion for Relief of SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of the Bungalow Series F Trust follows:

1. Admitted.
2. Admitted in part and denied in part. It is admitted only Debtor executed the Note attached as Exhibit "A" to the Motion for Relief in favor of Countrywide Home Loans, Inc. Debtor denies Movant is the holder of the Note as after reasonable investigation Debtor is unable to verify whether Movant possesses the Note and therefore that part of this paragraph is denied.
3. Admitted.
4. Admitted.

5. Admitted in part and denied in part. It is admitted Debtor entered into a loan modification. The terms set forth in this paragraph are denied. The loan modification is a document that speaks for itself as to its terms.
6. Denied. Debtor filed a Motion to Modify Confirmed Plan on July 19, 2021. (Doc. 48). That motion was served on Movant at the address provided on its Transfer of Proof of Claim #6 (c/o SN Servicing Corporation, 323 Fifth Street, Eureka, CA 95501-0305). Movant did not object to the motion. The motion included a proposed Sixth Amended Plan that provided for payment of \$34,395.35 in post-petition mortgage arrears. The Court issued an Order granting the motion on August 16, 2021. (Doc. 52).
7. Denied. This is a legal conclusion to which no response is required. The text of 11 U.S.C. §362 (d)(1) speaks for itself.
8. Denied. This is a legal conclusion to which no response is required.
9. Denied. Debtor submits the payment of these post-petition mortgage arrears was provided for in the Sixth Amended Plan.
10. Admitted.
11. Denied. Debtor submits the payment of these post-petition mortgage arrears was provided for in the Sixth Amended Plan.
12. Admitted.
13. Admitted.
14. Denied. This is a legal conclusion to which no response is required.
15. Denied. This is a legal conclusion to which no response is required.

WHEREFORE, Debtor, Carleen Maynor, respectfully requests this Honorable Court deny the Motion for Relief.

Respectfully Submitted,

NEWMAN WILLIAMS, P.C.

By: /s/ Robert J. Kidwell
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Date: October 19, 2021